

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

DELL TECHNOLOGIES INC. AND EMC  
CORPORATION,

Defendants.

Case No. 6:21-cv-00788-ADA

JURY TRIAL DEMANDED

**JOINT MOTION TO DISMISS**

WHEREAS, Plaintiff Sonrai Memory Limited (“Plaintiff”) and Defendants Dell Technologies Inc. and EMC Corporation, (“Defendants”) have resolved Plaintiff’s claims for relief against Defendants and Defendants’ claims for relief against Plaintiff asserted in this case.

NOW, THEREFORE, Plaintiff and Defendants, through their attorneys of record, request this Court to dismiss Plaintiff’s claims for relief against Dell Technologies Inc. and EMC Corporation, with prejudice and Defendants’ claims or defenses for relief against Plaintiff without prejudice, and with all attorneys’ fees, costs of court and expenses borne by the party incurring same.

Respectfully submitted,

Dated: August 17, 2022

/s/ Amy E. Hayden

Reza Mirzaie (CA SBN 246953)

rmirzaie@raklaw.com

Marc A. Fenster (CA SBN 181067)

mfenster@raklaw.com

Dated: August 17, 2022

/s/ J. Stephen Ravel

J. Stephen Ravel

KELLY HART & HALLMAN LLP

303 Colorado, Suite 2000

Austin, Texas 78701

James Milkey (CA SBN 281283)  
jmilkey@raklaw.com  
Amy E. Hayden (CA SBN 287026)  
ahayden@raklaw.com  
Christian W. Conkle (CA SBN 306374)  
cconkle@raklaw.com  
Jonathan Ma (CA SBN 312773)  
jma@raklaw.com  
RUSS AUGUST & KABAT  
12424 Wilshire Blvd., 12th Floor  
Los Angeles, California 90025  
Telephone: (310) 826-7474

*Attorneys for Plaintiff Sonrai Memory  
Limited*

Tel: (512) 495-6429  
Fax: (512) 495-6401  
Email: [steve.ravel@kellyhart.com](mailto:steve.ravel@kellyhart.com)

*Attorney for Defendants Dell Technologies  
Inc. and EMC Corporation*

**CERTIFICATE OF SERVICE**

I certify that on August 17, 2022, a true and correct copy of the foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

/s/ Amy E. Hayden  
Amy E. Hayden